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 FRANCIS BURGA AS THE  
 8 ADMINISTRATOR OF THE  
 ESTATE OF MARGELUS BURGA  
 9

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**  
 12 **SAN JOSE DIVISION**

13 UNITED STATES OF AMERICA,

14                   Petitioner,

15                   v.

16 FRANCIS BURGA; FRANCIS BURGA AS  
 THE ADMINISTRATOR OF THE ESTATE  
 17 OF MARGELUS BURGA; and RUSSELL  
 MANSKY,

18                   Respondents.  
 19

Case No. 18-CV-01633 BLF (SVK)

**JOINT STIPULATION TO ADOPT  
 SPECIAL MASTER'S REPORT  
 REGARDING RESPONDENTS'  
 PRIVILEGE ASSERTIONS**

Judge: Honorable Susan van Keulen

Honorable Beth L. Freeman

20                   On December 18, 2019, the Court ordered the Special Master to provide a written report  
 21 containing his recommended resolution of the parties' disputes regarding Respondents' privilege  
 22 claims and any exceptions asserted by the Government with respect to such claims by January 31,  
 23 2020. In addition, the Court ordered the parties to file objections to or a motion to adopt or  
 24 modify the Special Master's report by February 14, 2020. The Special Master submitted his report  
 25 to the parties which was filed under seal with the Court on February 3, 2020.  
 26  
 27  
 28

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The parties have reviewed the Special Master's Report and have conferred and have no objections to the Special Master's Report. Accordingly, the parties stipulate that the Special Master's report should be adopted by the Court and that Respondents shall produce to the Government, fully or in redacted form, as appropriate, any documents identified in the Special Master's Report as not privileged or only partially privileged, by February 28, 2020.

DATED: February 14, 2020

Respectfully submitted,

SIDEMAN & BANCROFT LLP

By: /s/ Jay R. Weill  
 Jay R. Weill

Attorneys for FRANCIS BURGA; FRANCIS  
 BURGA AS THE ADMINISTRATOR OF THE  
 ESTATE OF MARGELUS BURGA

DATED: February 14, 2020

RICHARD E. ZUCKERMAN  
 Principal Deputy Assistant Attorney General

By: /s/ Amy Matchison  
 AMY MATCHISON  
 Trial Attorney, Tax Division  
 United States Department of Justice

*Attorneys for the United States of America*

### **ATTESTATION**

Pursuant to Civil Local Rule 5.1., I hereby attest that all counsel represented by conformed signatures above have concurred in the filing of this Stipulation.

DATED: February 14, 2020

SIDEMAN & BANCROFT LLP

By: /s/ Jay R. Weill